

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

TOWSIF HUSSAIN,

Plaintiff,

Case No.

v.

EQUIFAX,

Defendant.

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**DEFENDANT EQUIFAX INFORMATION SERVICES, LLC’S (Incorrectly named  
Equifax in Complaint) NOTICE OF REMOVAL**

Equifax Information Services, LLC (*Incorrectly named Equifax in complaint*) (“Equifax”) files this Notice of Removal pursuant to 28 U.S.C. § 1446(a) and in support thereof would respectfully show the Court as follows:

**A. PROCEDURAL BACKGROUND**

1. On or about December 4, 2024, Plaintiff Towsif Hussain (“Plaintiff”) filed the Complaint in the Civil Court of the State of New York, County of Queens, Index No. 029444/2024/QU (“State Court Action”) alleging violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681, *et seq.*, against Equifax Inc.

2. Equifax was served with Plaintiff’s Complaint on December 16, 2024. This Notice of Removal is being filed with the thirty (30) day time period required by 28 U.S.C. § 1446(b).

**B. GROUNDS FOR REMOVAL**

3. The present suit is an action over which the United States District Court, Eastern District of New York has original jurisdiction pursuant to 28 U.S.C. § 1331, as it is a civil action founded on a claim or right arising under the laws of the United States, and may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. § 1446(b). Removal is proper

because Plaintiff's claims present a federal question. In the Complaint, Plaintiff seeks damages for Defendant's alleged violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.*

**C. COMPLIANCE WITH PROCEDURAL REQUIREMENTS**

4. Pursuant to 28 U.S.C. § 1441(a), venue of the removal action is proper in the United States District Court, Eastern District of New York because it is in the district and division embracing the place where the state court action is pending.

5. In accordance with 28 U.S.C. § 1446(a), a copy of all executed process, pleadings asserting causes of action, and orders in the State Court Action served upon Defendant Equifax are attached hereto as **Exhibit A**.

6. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to the Plaintiff and will file a copy of this Notice of Removal with the Queens County Civil Court, New York as required by 28 U.S.C. § 1446(d).

WHEREFORE, Equifax request that the above-described action be removed to this Court.

Respectfully submitted this 15<sup>h</sup> day of January, 2025.

/s/ Forrest M. "Teo" Seger III

Forrest M. "Teo" Seger III

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**ATTORNEY FOR DEFENDANT  
EQUIFAX INFORMATION  
SERVICES LLC** (*Incorrectly named  
Equifax in complaint*)

**CERTIFICATE OF SERVICE**

This is to certify that on January 15<sup>th</sup>, 2025, a true and correct copy of the foregoing document has been filed with the Clerk of the Court which will send a notification to all counsel of record via U.S. Mail:

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/s/ Forrest M. "Teo" Seger III  
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